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DEC 16 1991

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ORIGINAL
4IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 1991

In re: James Blodgett

91-716

Petitioner

Respondent's objection to Amicus Brief

Comes now Charles Rodman Campbell the respondent in the above entitled cause and herein objects to this court's consideration of the Amicus curiae brief submitted by the Snohomish County prosecutors office on November 25th 1991 in this cause.

1. This is a mandamus action and the Snohomish County prosecutors have asserted that they represent the state of Washington yet seek to include their complaints etc under the same cause of action as Petitioner Blodgett. If the State of Wa. has a claim it must raise its own cause of action. Respondent has already asserted that petitioner lacks standing. Accordingly the Amicus Brief is in conflict with petitioner's cause of action.
2. The Amicus Brief submitted is not appropriate to a mandamus cause of action and is not allowed. And if allowed was untimely filed.
3. The Snohomish county prosecutors office in submitting the Amicus Brief has knowingly misrepresented the issues it's raised in an effort to gain personal recognition, favor of this court to consider the mandamus action and to deliberately prejudice respondent by submitting manufactured Affidavits as well as perjured Affidavits.

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Specifically, The Snohomish County prosecutors named in the Amicus Brief have repetitively in the past drug Respondents case through the media and have touted the victims family etc. to prejudice the actions pending in the courts for respondent by their improper attempts to generate adverse public pressure at the various times the court proceedings were taking place in order to influence the courts actions which have been effective in prejudicing respondent. Second, the Affidavits by the Ahlers were in fact requested by the prosecutors. Furthermore, the facial language of the Ahlers Affidavits clearly only seek Vengeance and plainly assert that their alleged healing can not begin until respondent is executed. The Ahlers are in N. Dakota and have lived their both prior to the murders in 1982 and since then. It is highly unlikely that they receive television coverage in N. Dakota of this case and choose to parade themselves in the media in Washington State. Nor do the Ahlers live in fear that respondent will get them as they claim. Respondent has no connection to the Ahlers in any way nor has ever made any threats implied or otherwise toward them or to them.

In regard to the Candy Ashbrook Affidavit respondent asserts that the Affidavit was solicited by the prosecuting attorneys. Furthermore Ms. Ashbrook has knowingly maligned respondent with perjured testimony in an effort

to further advance her own personal as well as organizational objectives. There is no evidence or factual data that supports the inference that respondents case was responsible for a 31% decrease in phone calls to the center in 1982 nor that respondents case is responsible for rapes being committed or for rapes not being reported. Further more ms. Ashbrooks statement detailing the alleged experiences of a woman alleged to have been raped in 1989 (Aff. at pg. 22 #9) is a patently false and perjured statement. That woman does not exist, the alleged rape and threat never happened.

It needs to be pointed out that ~~whatever~~ ms. Ashbrooks Affidavit reads like it was composed to aid the ~~prosecutors~~ prosecutors position. the Affidavit does not substantiate the created issue in the prosecutors argument and ~~that~~ the prosecutors argument that respondents not being executed is the cause of all Washingtons ills and is also because of the ninth circuits inaction is patently unethical and beyond ms. Ashbrooks statements. This kind of creation of issues is dispicable

Finally, the prosecutors in their Amicus brief state that the original crime in 1974 against the Victim Renae involved respondent in the course of the rape, ~~sarcastically~~ holding a

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knife against the throat of renae one year old daughter (Amicus brief pg.5.) this is a variation of the petitioners similar statement at pg. 4. in petitioner's Brief for mandamus.

Both statements are patently false and while in part is due initially because the Washington Supreme court made ~~said~~ a similar erroneous statement based on what respondents trial court said in the judges questionnaire pursuant to

RCW 10.95.120 in his death penalty proceedings the judges statement was falsely stated in that report and was in fact created by the media.

Respondent has informed all courts of that fact and the prosecutors and petitioners as well always use that statement for its prejudicial effect knowing that the 1974 trial transcripts of the 1974 crime clearly and unequivocably demonstrate that respondent never at any time was alleged to have held a knife to the throat of the child. The prosecutors office tried that case and as was also stated, fully aware from the record that that did not happen, so there is no denying their unethical use of false and prejudicial statement asserted knowingly by them for its prejudicial affect on this court and the media

Conclusion this court should not accept the proposed Amicus brief.

Dated this 10th of December 1991

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